

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AMERICAN CENTER FOR EXCELLENCE)	
IN SURGICAL ASSISTING INC.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 15 CV 7290
)	
COMMUNITY COLLEGE DISTRICT 502,)	Judge Gary Feinerman
COLLEGE OF DUPAGE, DR. THOMAS)	
CAMERON, DR. KAREN M. SOLT, and)	
DR. KATHY CABAI,)	
)	
Defendants.)	

**Defendants’ Dr. Thomas Cameron, Dr. Karen Solt
and Dr. Kathy Cabai’s Unopposed Motion to Postpone
the Deadline to Respond to Plaintiff’s Written Discovery**

NOW COME Defendants Dr. Thomas Cameron, Dr. Karen Solt and Dr. Kathy Cabai (the “Defendant Doctors”) by and through their attorneys, and for their unopposed motion (“Motion”) to postpone the deadline to respond to Plaintiff American Center for Excellence in Surgical Assisting Inc.’s (“Plaintiff”) written discovery requests, state as follows:

1. This matter arises from a dispute stemming from the College of DuPage’s surgical assistant program. On November 24, 2015, the Defendant Doctors, in conjunction with the other defendants, moved to dismiss Plaintiff’s Complaint in its entirety.
2. The Motion to Dismiss was fully briefed, and on March 3, 2016, this Court indicated that it would dismiss the Defendant Doctors. Accordingly, on March 10, 2016, the parties submitted an Amended Joint Initial Status Report in which Plaintiff indicated it will dismiss Defendant Doctors from the lawsuit. (Dkt #29, p. 2)
3. A ruling on the Motion to Dismiss has not issued. On May 13, 2016, the parties

propounded their first set of written discovery, which included interrogatories, document requests and requests for admissions to Defendant Doctors. The deadline for Defendant Doctors to submit their written responses is June 13, 2016.

4. The reason for this Motion is based upon the Court's indication that it will dismiss Defendant Doctors from the lawsuit. If the Defendant Doctors are indeed dismissed from the lawsuit, they would not have to respond to the written discovery requests.

5. Counsel for Defendants personally consulted with counsel for Plaintiff about postponing the deadline. Counsel for Plaintiff stated that he would not oppose this Motion and agreed to allow the Defendant Doctors until after the Court issues its ruling on the pending motion to dismiss to answer written discovery.

6. This is the first request by the Doctor Defendants for an extension to respond to written discovery.

WHEREFORE, Defendants Dr. Thomas Cameron, Dr. Karen Solt and Dr. Kathy Cabai request the Court enter an Order postponing the deadline for them to respond to written discovery until the Court issues its ruling on the Motion to Dismiss and for such other relief as the Court deems just and proper.

Respectfully submitted,

Dr. Thomas Cameron, Dr. Karen Solt and
Dr. Kathy Cabai

By: s/ Michael T. Roche
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